

From: "Diane Flood" <dflood@firstcitizensww.com> on 01/27/2006 04:39:57 PM

Subject: Interagency Concentrations in Commercial Real Estate Lending

My suggestion on your proposal is that seasoned multi-family rental properties should not be put into the same category as construction loans. I feel they present a much different and a much lower risk. Therefore, I would suggest that a higher percentage of multi-family properties than the 300% of capital be allowed. I would suggest closer to the 500% of capital.

We hope you take this into consideration as you prepare your guidance.

Sincerely,

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